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Counsel for Ad Hoc Group of Subrogation Claim Holders

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Chapter 11
Bankr. Case No. 19-30088 (DM)
(Jointly Administered)

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

**RESERVATION OF RIGHTS OF THE AD
HOC GROUP OF SUBROGATION CLAIM
HOLDERS REGARDING THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS'
MOTION FOR ENTRY OF AN ORDER
DIRECTING SUPPLEMENTAL
DISCLOSURE IN THE FORM OF A LETTER
FROM THE TCC**

Date: April 7, 2020
Time: 10:00 a.m. (PT)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 The Ad Hoc Group of Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”) in the
2 above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company
3 (collectively, “**Debtors**”), by its attorneys Willkie Farr & Gallagher LLP and Diemer & Wei, LLP,
4 hereby submits this reservation of rights (the “**Reservation of Rights**”) regarding *The Official*
5 *Committee of Tort Claimants’ Motion for Entry of an Order Directing Supplemental Disclosure in*
6 *the Form of a Letter from the TCC* (the “**Motion**”) [Docket. No. 6636].¹ In support of this
7 Reservation of Rights, the Ad Hoc Subrogation Group respectfully represents as follows:

8 **RESERVATION OF RIGHTS**

9 The order authorizing the Official Committee of Tort Claimants (the “**TCC**”) to enter into
10 their restructuring support agreement with the Debtors (the “**TCC RSA**”) was entered on December
11 19, 2019 [Docket No. 5174]. The Debtors filed their first proposed disclosure statement (the
12 “**Disclosure Statement**”) on February 7, 2020 [Docket No. 5700], and the Court entered the order
13 approving the solicitation version of the Debtors’ Disclosure Statement on March 17, 2020 [Docket
14 No. 6340]. Now the TCC has filed an untimely Motion, which will be heard on one day’s notice, in
15 order to supplement the Disclosure Statement with a letter regarding issues that the TCC has known
16 about for months. Because the TCC’s Motion was filed late, the Ad Hoc Subrogation Group reserves
17 all rights with respect to the Motion, including to oppose the Motion at the hearing on April 7, 2020.
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27 ¹ Capitalized terms used but not defined shall have the meanings ascribed in the Motion [Docket No. 6636].
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1 Dated: April 6, 2020

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3 **WILLKIE FARR & GALLAGHER LLP**

4
5 /s/ Matthew A. Feldman

6 Matthew A. Feldman (*pro hac vice*)

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